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*Attorneys for Defendant Brendan J. Stangis*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah

**PETITION FOR ATTORNEYS  
FEES AND COSTS FOR  
DEFENDANT BRENDAN J.  
STANGIS**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

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limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDING, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

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Pursuant to the Court's Memorandum Decision and Order issued March 18, 2024, Doc. 275, Defendant Brendan J. Stangis ("Stangis") submits this Petition for Attorneys Fees and Costs and asks this Court to order Plaintiff Securities and Exchange Commission to pay Stangis's attorneys fees and costs incurred to date in this action arising from the TRO, asset freeze, and appointment of the Receiver, in the amount of \$42,839.50.

This amount is reasonable and proper considering the issues presented in this action and the TRO and expedited discovery required therein. The factual basis for this request is set forth and explained in the accompanying Declaration of Attorneys Fees and Costs and the exhibit attached thereto.

**DATED:** April 17, 2024

/s/ Brent R. Baker

Brent R. Baker

Tucker F. Levis

*Attorneys for Defendant Brendan J. Stangis*

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that I am an employee of Buchalter, PC, and that on this 17<sup>th</sup> day of April, 2024, I filed a true and correct copy of the foregoing document, PETITION FOR ATTORNEYS FEES AND COSTS FOR DEFENDANT BRENDAN J. STANGIS, with the Clerk of the Court through the CM/ECF system which sent electronic notification and service to all counsel of record.

/s/ Brent R. Baker

Employee of Buchalter, PC